

***Remarks***

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 12, 14, 15 and 23-29 are pending in the application, with claim 12 being the independent claim. Claim 12 is sought to be amended. Support of this amendment may be found in the specification, for example, in paragraphs [0008], [0029], and [0045]. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicant respectfully requests that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

***Rejections under 35 U.S.C. § 102***

Claims 12, 14, 23, 24 and 26-28 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,375,176 to Getchel et al. (herein "Getchel"). Applicant respectfully traverses this rejection.

Regarding claim 12, Applicant submits that the cited portions of *Getchel* do not at least teach or disclose a system configured to reduce wafer slipping, *inter alia*, an expandable annular tube that is sealed to be pressurized and configured to expand to in turn expand the wafer chuck when pressurized.

The cited portions of *Getchel* appear merely to disclose a tube 580 used to circulate fluid through the heat sink/heater assembly 532. See *Getchel* col. 17, lines 61-62. Therefore, the cited portions of *Getchel* fail to disclose or teach, for example, an expandable annular tube that is sealed to be pressurized and the expandable annular tube

to expand the wafer chuck when pressurized. Even if *arguendo* the cited portions of *Getchel* disclosed or taught an annular tube that is sealed to circulate fluid, the cited portions of *Getchel* are completely silent as to an expandable annular tube that is configured to expand under pressure to cause expansion of the wafer chuck to which it is coupled. The circulating tubes of *Getchel* are specifically designed to cool (and therefore cause thermal contraction to) the wafer chuck. In other words, the claimed annular tube that can be pressurized and configured to expand when pressurized causing wafer chuck to expand is distinct from a cooling tube not configured to be pressurized and increase its dimensions for expanding the wafer chuck because the cooling tube likely shrinks relative to what it is prior to the circulation of cool fluid.

Independent claim 12, as amended, is thus patentable over *Getchel* because it does not expressly or inherently disclose "an annular tube that is sealed to be pressurized and configured to expand when pressurized for expanding a wafer chuck coupled thereto." For the above reasons, *Getchel* does not anticipate claim 12, as amended, because *Getchel* fails to disclose each element of claim 12. Applicant respectfully requests that its rejection should be withdrawn.

Dependent claims 14, 23, 24 and 26-28 are likewise patentable over *Getchel* for at least the same reason as independent claim 12 from which they depend, and further in view of their own respective features. Accordingly, Applicant respectfully requests that the rejection of claims 14, 23, 24 and 26-28 be reconsidered and withdrawn.

In particular, Applicant asserts the dependent claim 14 is patentable over *Getchel* in view of the "wherein said annular tube is coupled to an outer edge of said wafer

chuck" feature recited in claim 14. The tube 580 of *Getchel* is specifically designed to circulate fluid through the heat sink/heater assembly 532 of the chuck. See *Getchel* FIG. 11A and col. 17, lines 61-65. For at least this reason, the Applicant respectfully requests that the rejection of claim 14 should be reconsidered and withdrawn.

***Rejections under 35 U.S.C. § 103***

Claim 25 was rejected under 35 U.S.C. § 103(a) as being unpatentable over *Getchel*. Applicant respectfully traverses this rejection.

Claim 25 depends from claim 12 and therefore is allowable over the cited portions of *Getchel* for the reasons noted above with respect to claim 12, as well as for the features it recites individually. For at least these reasons, the Applicant respectfully requests that the rejection of claim 25 should be reconsidered and withdrawn.

***Request for Reconsideration of Non-Elected Claims/Species Restriction***

Claim 15 remains withdrawn from further consideration as being directed to a non-elected invention. Applicant asserts that at least claim 12 is an allowable generic claim. This was addressed previously in the Reply to Requirement for Election of Species filed March 10, 2006. Claim 12 is generic to claim 15. Since claim 12 should now be found allowable, claim 15 should be brought back into the application and found allowable, at least based on its dependency to claim 12. (See M.P.E.P. §809).

Reconsideration and withdrawal of the election of species requirement is respectfully requested.

Reply to Office Action of October 1, 2009


Peter KOCHERSPERGER  
Appl. No. 10/780,877

***Conclusion***

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicant believes that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

  
Sanjeev K. Singh  
Agent for Applicants  
Registration No. 64,418

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77 Danbury Road  
Mail Stop 418  
Wilton, Connecticut 06897  
(203) 761-4451  
1037380, 1 DOC